

RCH/SPN/HDM/CRH/MJM  
F. #2018R01309

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

RASHID SULTAN RASHID AL MALIK ALSHAHHI,  
also known as "Rashid Al Malik"  
and "Rashid Al-Malik,"

THOMAS JOSEPH BARRACK and  
MATTHEW GRIMES,

TO BE FILED EX PARTE, IN  
CAMERA AND UNDER SEAL

No. 21-CR-371 (S-1) (BMC)

Defendants.

----- X

GOVERNMENT'S MEMORANDUM IN SUPPORT OF ITS CLASSIFIED,  
EX PARTE, IN CAMERA MOTION FOR A PROTECTIVE ORDER PURSUANT TO  
SECTION 4 OF THE CLASSIFIED INFORMATION PROCEDURES ACT AND  
RULE 16(d)(1) OF THE FEDERAL RULES OF CRIMINAL PROCEDURE

BREON PEACE  
United States Attorney  
Eastern District of New York

RYAN C. HARRIS  
SAMUEL P. NITZE  
HIRAL D. MEHTA  
CRAIG R. HEEREN  
Assistant U.S. Attorneys  
(Of Counsel)

MATTHEW G. OLSEN  
Assistant Attorney General  
National Security Division  
U.S. Department of Justice

MATTHEW J. MCKENZIE  
Trial Attorney, Counterintelligence  
and Export Control Section  
(Of Counsel)